

REMARKS

Claims 1-16 are pending in the application. Claims 1 and 9-16 have been amended. No new matter has been added. Reconsideration is respectfully requested in view of the amendments to the claims and the following remarks.

I. Interview Summary

Applicant wishes to thank the Examiner for the telephonic interview of October 11, 2005. Applicant's representative Kelvin Vivian and Examiner Kyle Stork participated in the interview. The § 112 rejections and the § 102 rejections of claim 1 in view of U.S. Patent No. 6,732,331 ("Alexander") were generally discussed.

With respect to the § 112 rejections the Examiners suggested amending the claim limitation "source code of a non-web enabled application on a server" to read "source code of a legacy application having mixed presentation logic on a server" to overcome the § 112 rejections, and to further distinguish the claims from Alexander. In addition, Applicant further proposed to amend the claims to further clarify the invention. No agreement was reached with respect to the allowability of the claims.

II. The § 112 Rejections

Claims 1-16 were rejected under 35 U.S.C. § 112, first paragraph, as containing subject matter not described in the application. In particular, the Examiner asserts that the limitation "source code of a non-web enabled application on a server" is not disclosed within the specification.

Claims 1-16 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Specifically, the Examiner asserts that the specification does not clearly define the term "source code of a non-web enabled application".

During the telephonic interview, Applicant directed the Examiner's attention to page 2, lines 22-23 of the specification where a definition of the term "application" is provided. Further, Applicant directed the Examiner's attention to page 4, lines 7-9, where a discussion of an interactive legacy application having mixed business and presentation logic is provided as an example of an application that must be restructured to be enabled as a web application. Though Applicant believes there is sufficient disclosure in the specification to support the limitation "source code of a non-web enabled application on a server", Applicant has amended this limitation to read "source code of a legacy application having mixed presentation logic on a server" as suggested by the Examiner to overcome the § 112 rejections.

III. The §102/103 Rejections

Claims 1-5 and 8-13 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,732,331 ("Alexander").

Claims 6-7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Alexander in view of U.S. Patent Application Pub. No. 2002/0162093 ("Zhou").

Applicant respectfully traverses.

Claim 1, as amended, recites a method for converting display source code of a legacy application having mixed business and presentation logic on a server to a network interactive web-browser page.

In particular, the method includes resolving the display source code of the legacy application into a plurality of record formats, and resolving a plurality of references within each record format to database files. The plurality of references within the database files are further parsed to a web-language file using nested tags to capture a hierarchy and relationship of the plurality of references to create network user interface pages. The network user interface pages are then converted to an object-oriented platform-independent network language.

Alexander discloses a system and process for managing content organized in a tag-delimited template (see Abstract). Alexander, however, fails to disclose several aspects of claim 1.

First, Alexander fails to disclose a method for converting display source code of a legacy application having mixed business and presentation logic on a server to a network interactive web-browser page, as required by claim 1 (emphasis added). Instead, Alexander discloses only techniques for managing content for use in web pages based on metadata templates (see Abstract; col. 2, ll. 49-56). More specifically, Alexander discloses metadata templates (generated from a collection of classes in a base template 33) that can be used to describe information about a number of web pages 49-52, as shown in FIG. 3 (col. 6, ll. 24-37). Alexander, however, is silent as to how the collection of classes in the base template 33 are derived. Consequently, Alexander cannot disclose converting display source code of a legacy application having mixed business and presentation logic on a server to a network interactive web-browser page.

Second, Alexander fails to disclose resolving the display source code of a legacy application into a plurality of record formats. Alexander, in general, fails to discuss legacy applications. Thus, Alexander cannot disclose resolving the display source code of a legacy application into a plurality of record formats, as recited in claim 1.

Moreover, while Alexander may process HTTP content of a web page, as suggested by the Examiner, Alexander fails to disclose that such HTTP processing includes resolving the display source code of a legacy application – or any application – into a plurality of records format. See MPEP 2163.07 - “To establish inherency, the extrinsic evidence ‘must make clear that the missing descriptive matter is necessarily present in the thing described in the reference, and that it would be so recognized by persons of ordinary skill. Inherency, however, may not be established by probabilities or possibilities. The mere fact that a certain thing may result from a

Attorney Docket: CA920010014US1/2182P

given set of circumstances is not sufficient.” *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950-51 (Fed. Cir. 1999). Claim 1 is, therefore, allowable over Alexander.

Claims 2-9 and 14-15 depend from claim 1, and are allowable for at least the reasons that apply to claim 1.

Independent claims 10, 11, 12 and 13 (and the claims that depend therefrom) incorporate limitations similar to claim 1, and are also allowable for at least the reasons that apply to claim 1.

In view of the foregoing, it is submitted that the claims 1-16 are allowable over the cited references, and are in condition for allowance. Should any unresolved issues remain, the Examiner is invited to call Applicant's attorney at the telephone number indicated below.

Respectfully submitted,
SAWYER LAW GROUP LLP



Kelvin M. Vivian
Attorney for Applicant(s)
Reg. No. 53,727
(650) 493-4540

October 26, 2005